

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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NAUTILUS INSURANCE COMPANY	:	
	:	
v.	:	
	:	NO. 20-00289
MOTEL MANAGEMENT SERVICES,	:	
INC. d/b/a NESHAMINY INN and	:	
THE MARY ETZRODT REAL	:	
ESTATE TRUST and NI45, LLC and	:	
E.B.	:	

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**ANSWER OF PLAINTIFF NAUTILUS INSURANCE COMPANY  
TO COUNTERCLAIM OF DEFENDANTS MOTEL MANAGEMENT  
SERVICES, INC., THE MARY ETZRODT REAL ESTATE TRUST AND NI45, LLC**

Plaintiff, Nautilus Insurance Company, by and through its attorneys, Bennett, Bricklin & Saltzburg LLC and Louis E. Bricklin, Esquire, hereby answer the counterclaim of defendants Motel Management Services, Inc., The Marty Etzrodt Real Estate Trust and NI45, LLC as follows:

1. Admitted.
2. Admitted.

3-4 inclusive. Nautilus Insurance Company incorporates herein by reference the averments of its complaint for declaratory judgment and avers that for the reasons set forth therein Nautilus Insurance Company is entitled to the declaratory judgment which it seeks.

WHEREFORE, plaintiff and defendant on the counterclaim Nautilus Insurance Company, prays this Honorable Court to deny the declaratory judgment sought by defendants and plaintiffs on the counterclaim, Motel Management Services, Inc., The Marty Etzrodt Real Estate Trust and

NI45, LLC, and, instead, to enter the declaratory judgment sought by Nautilus Insurance Company in its complaint for declaratory judgment.

BENNETT, BRICKLIN & SALTZBURG LLC



BY: \_\_\_\_\_

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